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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., and HENDRINA VIVAS
CASTILLO,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 25-cv-1766

**DECLARATION OF EMILOU MACLEAN
IN SUPPORT OF ADMINISTRATIVE
MOTION OF PLAINTIFFS M.H. AND E.R.
TO PROCEED UNDER PSEUDONYM**

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1 I, Emilou MacLean, declare as follows:

2 1. I am an attorney at law duly licensed and entitled to practice in the State of
3 California. I am a Senior Staff Attorney at ACLU Foundation of Northern California, counsel of
4 record in this action for Plaintiffs. I have personal knowledge of the facts set forth in this declaration
5 and, if called as a witness, I could and would testify competently thereto.

6 2. I file this Declaration in support of the Administrative Motion of Plaintiffs M.H. and
7 E.R. to Proceed Under Pseudonym ("Administrative Motion").

8 3. This matter pertains to the Department of Homeland Security's unlawful decision to
9 "vacate" the January 17, 2025 extension of Temporary Protected Status (TPS) for Venezuela and to
10 terminate the 2023 designation of TPS for Venezuela. The challenged orders will most immediately
11 go into effect on April 3, 2025, when employment authorization documents for nearly 350,000
12 Venezuelan TPS holders who initially registered for TPS under Venezuela's 2023 designation will
13 expire, and on April 7, 2025, when those TPS holders will lose their lawful immigration status and,
14 in many cases, become subject to deportation.

15 4. Plaintiffs, including M.H. and E.R., are suing Kristi Noem (in her official capacity as
16 Secretary of Homeland Security), the Department of Homeland Security, and the United States of
17 America (collectively "Defendants"). For the reasons explained more fully in their declarations,
18 M.H. and E.R. fear retaliation by the Defendants against them and their families. Defendants could,
19 for example, seek to retaliate, among other ways, in connection with M.H. and E.R.'s immigration
20 status and the status of their children. M.H. and E.R. also face the risk of retaliation from the
21 Venezuelan government, and actors in their local communities; and M.H. fears retaliatory action
22 against her husband given his employment for a U.S. government subcontractor.

23 5. Due to the urgent nature of this action, Plaintiffs are filing this Administrative Motion
24 concurrently with the filing of the Complaint, and thus Plaintiffs have not been able to meet and
25 confer with counsel for Defendants regarding this Motion.

26 /

27 /

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed this 19th day of February 2025, in San Francisco, California.

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5 /s/ Emilou MacLean
6 Emilou Maclean
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